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Hometown Pharmacies Urge Pharmacy Examining Board to Protect Patients with updated Rule

(RIO) – Hometown Pharmacy President Dan Strause today urged the Pharmacy Examining Board (PEB) to protect patient’s health and safety by ensuring patients receive in-person consultation with a trained pharmacist or pharmacist-intern on their original prescription and renewal fill.

“It makes no sense for the Pharmacy Examining Board (PEB) to create exemptions to their own guidelines regarding patient consultation. Creating an exemption to in person consultations for mail order pharmacies puts patient’s health and safety at risk,” said Dan Strause, President of Hometown Pharmacy.

The proposed Phar 7 rule revision clearly outlines the benefits of in person patient consultation.

Phar 7.01 Minimum procedures for compounding and dispensing. (1) Except as provided in sub. (4), a pharmacist or pharmacist-intern who compounds or dispenses according to a prescription order shall follow the procedures described in this rule and other applicable procedures. The pharmacist or pharmacist-intern as directed and supervised by a pharmacist shall:

(e) Give the patient or agent appropriate consultation relative to the prescription except that the prescriptions may be delivered by an agent of the pharmacist to a location of the patient’s choice if the delivery is accompanied by appropriate directions and an indication that the consultation is available by contacting the pharmacist. ***The consultation requirement applies to original and renewal prescription orders and, except at when prescriptions are delivered to a location of the patient’s choice, is not satisfied by only offering to provide a consultation.***

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The importance of in person consultation with a trained pharmacist is clearly outlined in the proposed rule revisions.

7.08 Patient Consultation (1) Patient consultation shall include all the following:

- (a) Name and description of the drug.
- (b) Form, dose, route of administration and duration for drug therapy.
- (c) Intended use of the drug and expected action.
- (d) Special directions and precautions for preparation, administration and use by patients.
- (e) Common severe side or adverse effects or interactions and therapeutic contraindications that may be encountered, including their avoidance, and the action required if they occur.
- (f) Techniques for self-monitoring drug therapy.
- (g) Proper storage and appropriate disposal method of unwanted or unused medication.
- (h) Action to be taken in the event of a missed does.

“Members of the PEB know how important an in-person consultation is on the original and renewal prescription. That’s why in-person consultation was required on every prescription fill in Wisconsin for many years. It’s not worth it to put patient’s health and safety at risk by exempting mail order pharmacies from the in-person consultation requirement to potentially save a few bucks,” said Strause.

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HOME TOWN PHARMACY

Pharmacy Examining Board

Dear Members of the Pharmacy Examining Board:

We thank you for receiving and considering comments on the proposed changes to Phar 7 and ensuring proper procedures are in place for patients and taxpayers.

We strongly believe it is critical for patient safety **that each patient receive their original and renewal prescription fill in person.** The patient consultation components, outlined in proposed Phar 7.08, reiterate the importance of patients being consulted on their medication, and especially the importance of the first fill patient-pharmacist interaction:

Proposed Phar 7.08 Patient consultation. (1) Patient consultation shall include all of the following:

- (a) Name and description of the drug.
- (b) Form, dose, route of administration and duration for drug therapy.
- (c) Intended use of the drug and expected action.
- (d) Special directions and precautions for preparation, administration and use by the patient.
- (e) Common severe side or adverse effects or interactions and therapeutic contraindications that may be encountered, including their avoidance, and the action required if they occur.
- (f) Techniques for self-monitoring drug therapy.
- (g) Proper storage and appropriate disposal method of unwanted or unused medication.
- (h) Action to be taken in the event of a missed dose.

Wisconsin for many years felt this initial consultation was so important that it mandated on every fill.

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...

- (e) Give the patient or agent appropriate consultation relative to the prescription except that prescriptions may be delivered by an agent of the pharmacist to a location of the patient’s choice if the delivery is accompanied by appropriate directions and an indication that consultation is available by contacting the pharmacist. The consultation requirement applies to original and renewal prescription orders and, except when prescriptions are delivered to a location of the patient’s choice, is not satisfied by only offering to provide consultation.

Any exemption to Phar 7 which allows patients to get their original fill by mail order, where no consultation exists, simply puts patient’s safety and health at risk. We are very concerned about a

process in which a patient would receive a new prescription and not receive the important patient consultation information contained in proposed Phar 7.08 (1) (a), (b), (c), (d), (e), (f) and (g) all on their own. And we question the situation in which professional judgment would deem that a patient should not receive consultation on new medications they are receiving.

One of the most critical times for a patient is when they are released from a care facility. That transition of care, especially starting their proper prescription protocols, is very important for their health and recovery. Studies have shown that proper adherence to prescription protocols, reduces readmission and improves patient outcomes. Without a consultation, how can someone “professionally judge” whether a patient is taking an over the counter (OTC) product or who has a diet consisting of something that could negatively interact with a medication? Removing this critical and basic consulting component is not in the best interest of patients nor taxpayers.

Under the current regulatory scheme, we already field calls from our community members who, with no choice, are forced into mail order. They feel abandoned. In fact, weekly there are many instances where our former patients, who have been forced into mail order, still call us and ask our pharmacists to explain their medications and the potential side effects.

The Pharmacy Examining Board (PEB) plays a critical role to help protect patients. And we believe the consultation component requirements outlined in proposed “**Phar 7.08 Patient consultation**” are critical for protecting patients. We have serious concerns that those requirements can be avoided if a patient is required to, or chooses to, receive their medication via mail order. We urge the PEB to ensure every patient is protected and receives a consultation.

Sincerely,

Dan Strause, President
Hometown Pharmacies of Wisconsin